

# *Indiana Criminal Justice Institute*

101 West Washington Street, Suite 1170 East Tower

Indianapolis, Indiana 46204

Phone: (317) 232-1233 • Fax: (317) 232-4979

[www.in.gov/cji](http://www.in.gov/cji)



## ***Funding Resource Manual***

*Victim Services Funding Opportunities:*

*Victims of Crime Act (VOCA)*

*Violence Against Women Act (STOP)*

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## **Victims of Crime Act (VOCA) – Assistance Funds**

### **Background:**

In 1984, the Victims of Crime Act (VOCA) established the Crime Victims Fund (Fund) in the U.S. Treasury and authorized the Fund to receive deposits of fines and penalties levied against criminals convicted of federal crimes. This Fund provides the source of funding for carrying out all of the activities authorized by VOCA.

The Office for Victims of Crime (OVC) makes annual VOCA crime victim assistance grants to states. The primary purpose of these grants is to support the provision of services to victims of crime throughout the nation.

For the purpose of these program guidelines, services are defined as those efforts that:

- (1) Respond to the emotional and physical needs of crime victims;
- (2) Assist primary and secondary victims of crime to stabilize their lives after victimization;
- (3) Assist victims to understand and participate in the criminal justice system; and
- (4) Provide victims of crime with a measure of safety and security such as boarding-up broken windows and replacing or repairing locks.

For the purpose of the VOCA crime victim assistance grant program, a crime victim is a person who has suffered physical, sexual, financial, or emotional harm as a result of the commission of a crime.

VOCA gives latitude to the Indiana Criminal Justice Institute (ICJI) to determine how VOCA victim assistance grant funds will best be used within Indiana. However, each grantee must abide by the minimal requirements outlined in VOCA and these program guidelines.

## Subrecipient Organization Requirements:

VOCA established eligibility criteria that must be met by all organizations that receive VOCA funds. These funds are to be awarded to subrecipients only for providing services to victims of crime through their staff.

Each subrecipient organization shall meet the following requirements:

- (1) **Public or Nonprofit Organization** – To be eligible to receive VOCA funds, organizations must be operated by public or nonprofit organization, or a combination of such organizations, and provide services to crime victims.
- (2) **Records of Effective Services** – Demonstrate a record of providing effective services to crime victims. This includes having the support and approval of its services by the community, a history of providing direct services in a cost-effective manner, and financial support from other sources.
- (3) **New Programs** – Indiana programs that have not yet demonstrated a record of providing services may be eligible to receive VOCA funding if they can demonstrate that at least 25% of their financial support comes from non-federal sources. It is important that organizations have a variety of funding sources besides federal funding in order to ensure their financial stability.
- (4) **Program Match Requirements** – The purpose of matching contributions is to increase the amount of resources available to projects supported by grant funds. Matching contributions of 20% (cash or in-kind) of the total cost of each VOCA project (VOCA grant plus match) are required with each VOCA-funded project and must be derived from non-federal sources. All funds designated as match are restricted to the same uses as the VOCA victim assistance funds and must be expended and documented within the grant period. Please see pages 17 and 18 for additional information on calculating match requirements.
- (5) **Volunteers** – Subrecipient organizations must use volunteers unless the ICJI determines there is a compelling reason to waive this requirement. A “compelling reason” may be a statutory or contractual provision concerning liability or confidentiality of counselor/victim information, which bars using volunteers for certain positions, or the inability to recruit and maintain volunteers after a sustained and aggressive effort.
- (6) **Promote Community Efforts to Aid Crime Victims** – Promote, within the community, coordinated public and private efforts to aid crime victims. Coordination may include, but is not limited to, serving on state, federal, local, or Native American task forces, commissions, working groups, coalitions, and/or multi-disciplinary teams. Coordination efforts also include developing written agreements that contribute to better and more comprehensive services to crime victims. Coordination efforts qualify an organization to receive VOCA victim assistance funds, but are not activities that can be supported with VOCA funds.
- (7) **Help Victims Apply for Compensation Benefits** – Such assistance may include identifying and notifying crime victims of the availability of compensation, assisting them with application forms and procedures, obtaining necessary documentation, and/or checking on claim status.
- (8) **Comply with Federal Rules Regulating Grants** – Subrecipients must comply with the applicable provisions of VOCA, the Program Guidelines, and the requirements of the [Office of Justice Programs Financial Guide](#), effective edition, which includes maintaining appropriate programmatic and financial records that fully disclose the amount and disposition of VOCA funds received. This includes: financial documentation for disbursements; daily time and attendance records specifying time devoted to allowable VOCA victim services; client files; the portion of the project supplied by other sources of revenue; job descriptions; contracts for services; and other records which facilitate an effective audit.

- (9) **Maintain Civil Rights Information** – Maintain statutorily required civil rights statistics on victims served by race, national origin, sex, age, and disability, within the timetable established by ICJI; and permit reasonable access to its books, documents, papers, and records to determine whether the subrecipient is complying with applicable civil rights laws. This requirement is waived when providing a service, such as telephone counseling, where soliciting the information may be inappropriate or offensive to the crime victim.
- (10) **Comply with State Criteria** – Subrecipients must abide by any additional eligibility or service criteria as established by ICJI including submitting statistical and programmatic information on the use and impact of VOCA funds.
- (11) **Services to Victims of Federal Crimes** – Subrecipients must provide services to victims of federal crimes on the same basis as victims of state/local crimes.
- (12) **No Charge to Victims for VOCA-Funded Services** – Subrecipients must provide services to crime victims, at no charge, through the VOCA-funded project. Any deviation from this provision requires prior approval by ICJI.
- (13) **Client-Counselor and Research Information Confidentiality** – Maintain confidentiality of client-counselor information, as required by state and federal law.
- (14) **Confidentiality of Research Information** – Except as otherwise provided by federal law, no subrecipient of monies under VOCA shall use or reveal any research or statistical information furnished under this program by any person and identifiable to any specific private person for any purpose other than the purpose for which such information was obtained in accordance with VOCA. Such information, and any copy of such information, shall be immune from legal process and shall not, without the consent of the person furnishing such information, be admitted as evidence or used for any purpose in any action, suit, or other judicial, legislative, or administrative proceeding.

## Eligible Subrecipient Organizations:

VOCA specifies that a subrecipient organization must provide services to crime victims and be operated by a public agency or nonprofit organization, or a combination of such agencies or organizations in order to be eligible to receive VOCA funding. Eligible organizations include victim services organizations whose mission is to provide services to crime victims. These organizations include, but are not limited to, sexual assault and rape treatment centers, domestic violence programs and shelters, child abuse programs, centers for missing children, mental health services, and other community-based victim coalitions and support organizations including those who serve survivors of homicide victims.

In addition to victim services organizations, whose sole purpose is to serve crime victims, there are many other public and nonprofit organizations that have components which offer services to crime victims. These organizations are eligible to receive VOCA funds, if the funds are used to expand or enhance the delivery of crimes victims' services. These organizations include, but are not limited to, the following:

- (1) **Criminal Justice Agencies** – Such agencies as law enforcement organizations, prosecutor's offices, courts, corrections departments, and probation and paroling authorities are eligible to receive VOCA funds to help pay for victims' services. For example, prosecutor-based victim services may include victim-witness programs, victim notification, and victim impact statements, including statements of pecuniary damages for restitution. Corrections-based victim services may include victim notification, restitution advocacy, victim-offender mediation programs, and victim impact panels. Police-based victim services may include victim crisis units or victim advocates, victim registration and notification, and cellular phone and alarm services for domestic abuse victims. In general, VOCA funds may be used to provide crime victim services that exceed law enforcement official's normal duties. Regular law enforcement duties such as crime scene intervention, questioning of victims and witnesses, investigation of the crime, and follow-up activities may not be paid for with VOCA funds.
- (2) **Religiously-Affiliated Organizations** – Such organizations receiving VOCA funds must ensure that services are offered to all crime victims without regard to religious affiliation and that the receipt of services is not contingent upon participation in a religious activity or event.
- (3) **State Crime Victim Compensation Agencies** – Compensation programs, including both centralized and decentralized programs, may receive VOCA assistance funds if they offer direct services to crime victims that extend beyond the essential duties of compensation staff such as claims investigations, distribution of information about compensation and referral to other sources of public and private assistance. Such services would include assisting victims in identifying and accessing needed services and resources.
- (4) **Hospitals and Emergency Medical Facilities** – Such organizations must offer crisis counseling, support groups, and/or other types of victim services. In addition, ICJI may only award VOCA funds to a medical facility for the purpose of performing forensic examinations on sexual assault victims if (a) the examination meets the standards established by the state, local prosecutor's office, or statewide sexual assault coalition; and (b) appropriate crisis counseling and/or other types of victim services are offered to the victim in conjunction with the examination.
- (5) **Others:** State and local public agencies such as mental health service organizations, state/local public child and adult protective services, legal service agencies and programs with a demonstrated history of advocacy on behalf of domestic violence victims, and public housing authorities that have components specifically trained to serve crime victims may receive VOCA funds. These programs are included since the intention of the VOCA grant program is to support and enhance the crime victim services provided by community.

## **Ineligible Recipients of VOCA Funds:**

Some public and nonprofit organizations that offer services to crime victims are not eligible to receive VOCA victim assistance funding. These organizations include, but are not limited to, the following:

- (1) **Federal Agencies.** This includes U.S. Attorneys Offices and FBI Field Offices. Receipt of VOCA funds would constitute an augmentation of the federal budget with money intended for state agencies. However, private nonprofit organizations that operate on federal land may be eligible subrecipients of VOCA victim assistance grant funds.
- (2) **In-Patient Treatment Facilities.** For example, those designed to provide treatment to individuals with drug, alcohol, and/or mental health-related conditions are not eligible to receive VOCA funds.

## Services, Activities, and Costs at the Subrecipient Level:

- (1) **Allowable Costs for Direct Services** – The following is a listing of services, activities, and costs that are eligible for support with VOCA victim assistance grant funds within a subrecipient's organization:
- (a) **Immediate Health and Safety** – Those services which respond to the immediate emotional and physical needs (excluding medical care) of crime victims such as crisis intervention; accompaniment to hospitals for medical examinations; hotline counseling; emergency food, clothing, transportation, and shelter (including emergency, short term nursing home shelter for elder abuse victims for whom no other safe, short-term residence is available); and other emergency services that are intended to restore the victim's sense of security. This includes services which offer an immediate measure of safety to crime victims such as boarding-up broken windows and replacing or repairing locks. Also allowable is emergency legal assistance such as filing restraining orders and obtaining emergency custody/visitation rights when such actions are directly connected to family violence cases and are taken to ensure the health and safety of the victim.
  - (b) **Mental Health Assistance** – Those services and activities that assist the primary and secondary victims of crime in understanding the dynamics of victimization and in stabilizing their lives after a victimization such as counseling, group treatment, and therapy. "Therapy" refers to intensive professional psychological/psychiatric treatment for individuals, couples, and family members related to counseling to provide emotional support in crises arising from the occurrence of crime. This includes the evaluation of mental health needs, as well as the actual delivery of psychotherapy.
  - (c) **Assistance with Participation in Criminal Justice Proceedings** – In addition to the cost of emergency legal services noted above in Section a "Immediate Health and Safety," there are other costs associated with helping victims participate in the criminal justice system that also are allowable. These services may include advocacy on behalf of crime victims; accompaniment to criminal justice offices and court; transportation to court; child care or respite care to enable a victim to attend court; notification of victims regarding trial dates, case disposition information, and parole consideration procedures; and assistance with victim impact statements. VOCA funds may not be used to pay for non-emergency legal representation such as for divorces or civil restitution efforts.
  - (d) **Forensic Examinations** – VOCA funds are used in some states for forensic medical exams when other funding (state compensation, public benefits, etc.) is unavailable. However, the Indiana General Assembly has created the Sex Crime Victim Services Fund to ensure that victims of sex crimes would not bear the burden of paying for emergency medical forensic treatment made necessary due to the sex crime. This fund is administered by the Victims Compensation unit of ICJI. Hospitals and/or sexual assault treatment centers bill the state directly for the cost of forensic medical exams.
  - (e) **Costs Necessary and Essential to Providing Direct Services** – This includes pro-rated costs of rent, telephone service, transportation costs for victims to receive services, emergency transportation costs that enable a victim to participate in the criminal justice system, and local travel expenses for service providers.
  - (f) **Special Services** – Services to assist crime victims with managing practical problems created by the victimization such as acting on behalf of the victim with other service providers, creditors, or employers; assisting the victim to recover property that is retained as evidence; assisting in filing compensation benefits; and helping to apply for public assistance.



(g) **Personnel Costs** – Costs that are directly related to providing direct services, such as staff salaries and fringe benefits (including malpractice insurance); the cost of advertising to recruit VOCA-funded personnel; and the cost of training paid and volunteer staff.

(2) **Other Allowable Costs and Services** – The services, activities, and costs listed below are not generally considered direct crime victim services, but are often a necessary and essential activity to ensure that quality direct services are provided. Before these costs can be supported with VOCA funds, ICJI and the subrecipient must agree that direct services to crime victims may not be offered without support for these expenses; that the subrecipient has no other source of support for them; and that only limited amounts of VOCA funds will be used for these purposes. The following list provides examples of such items:

(a) **Skills Training for Staff** – VOCA funds designated for training are to be used exclusively for developing the skills of direct service providers including paid staff and volunteers, so that they are better able to offer quality services to crime victims. An example of skill development is training focused on how to respond to a victim in crisis.

VOCA funds can be used for training both VOCA-funded and non-VOCA-funded service providers who work within a VOCA recipient organization, but VOCA funds may not be used for management and administrative training for executive directors, board members, and other individuals that do not provide direct services.

(b) **Training Materials** – VOCA funds can be used to purchase materials such as books, training manuals, and videos for direct service providers, within the VOCA-funded organization, and can support the costs of a trainer for in-service staff development. Staff from other organizations can attend in-service training activities that are held for the subrecipient's staff.

(c) **Training Related Travel** – VOCA funds can support costs such as travel, meals, lodging, and registration fees to attend training within the state or a similar geographic area. This limitation encourages ICJI and subrecipients to first look for available training within their immediate geographical area, as travel costs will be minimal. However, when needed training is unavailable within the immediate geographic area, ICJI may authorize VOCA funds to support training outside of the geographic area. For example, VOCA subrecipients may benefit by attending national conferences that offer skills building training workshops for victim assistance providers.

(d) **Equipment and Furniture** – VOCA funds may be used to purchase furniture and equipment that provides or enhances direct services to crime victims, as demonstrated by the VOCA subrecipient. VOCA funds may not support the entire cost of an item that is not used exclusively for victim-related activities. However, VOCA funds can support a pro-rated share of such an item. In addition, subrecipients may not use VOCA funds to purchase equipment for another organization or individual to perform a victim-related service. Examples of allowable costs may include pagers; computers; video-tape cameras and players for interviewing children; two-way mirrors; and equipment and furniture for shelters, work spaces, victim waiting rooms, and children's play areas.

The costs of furniture, equipment such as Braille equipment or TTY/TTD machines for the deaf or minor building alterations/improvements that make victim services more accessible to persons with disabilities are allowable. Refer to the [Office of Justice Programs Financial Guide](#), effective edition, before these types of decisions are made.

(e) **Purchasing or Leasing Vehicles** – Subrecipients may use VOCA funds to purchase or lease vehicles if they can demonstrate to ICJI that such an expenditure is essential to delivering services to crime victims. OVC and ICJI must give prior approval for all such purchases.

- (f) **Advanced Technologies** – At times, computers may increase a subrecipient's ability to reach and serve crime victims. For example, automated victim notification systems have dramatically improved the efficiency of victim notification and enhanced victim security.

In making such expenditures, VOCA subrecipients must describe to ICJI how the computer equipment will enhance services to crime victims; how it will be integrated into and/or enhance the subrecipient's current system; the cost of installation; the cost of training staff to use the computer equipment; the on-going operational costs, such as maintenance agreements, supplies; and how these additional costs will be supported. Property insurance is an allowable expense as long as VOCA funds support a pro-rated share of the cost of the insurance payments.

- (g) **Contract for Professional Services** – VOCA funds generally should not be used to support contract services. At times, however, it may be necessary for VOCA subrecipients to use a portion of the VOCA grant to contract for specialized services. Examples of these services include assistance in filing restraining orders or establishing emergency custody/visitation rights (the provider must have a demonstrated history of advocacy on behalf of domestic violence victims); forensic examinations on a sexual assault victim to the extent that other funding sources are unavailable or insufficient; emergency psychological or psychiatric services; or sign and/or interpretation for the deaf or for crime victims whose primary language is not English.

*Subrecipients are prohibited from using a majority of VOCA funds for contracted services, which contain administrative, overhead, and other indirect costs included in the hourly or daily rate.*

- (h) **Operating Costs** – Examples of allowable operating costs include supplies; equipment use fees, when supported by usage logs; printing, photocopying, and postage; brochures which describe available services; and books and other victim-related materials. VOCA funds may support administrative time to complete VOCA-required time and attendance sheets and programmatic documentation, reports, and statistics; administrative time to maintain crime victims' records; and the pro-rated share of audit costs.
- (i) **Supervision of Direct Service Providers** – ICJI may provide funds for supervision of direct service providers when they determine that such supervision is necessary and essential to providing direct services to crime victims. For example, ICJI may determine that using VOCA funds to support a coordinator of volunteers or interns is a cost-effective way of serving more crime victims.
- (j) **Repair and/or Replacement of Essential Item** – VOCA funds may be used for repair or replacement of items that contribute to maintaining a healthy and/or safe environment for crime victims, such as a furnace in a shelter. In the event that a vehicle is purchased with VOCA funds, related items, such as routine maintenance and repair costs and automobile insurance are allowable. ICJI must scrutinize each request for expending VOCA funds for such purposes to ensure the following: (1) that the building or vehicle is owned by the subrecipient organization and not rented or leased, (2) all other sources of funding have been exhausted, (3) there is no available option for providing the service in another location, (4) that the cost of the repair or replacement is reasonable considering the value of the building or vehicle, and (5) the cost of the repair or replacement is pro-rated among all sources of income.
- (k) **Public Presentations** – VOCA funds may be used to support presentations that are made in schools, community centers, or other public forums, and that are designated to identify crime victims and provide or refer them to needed services. Specifically, activities and costs related to such programs including presentation materials, brochures, and newspaper notices can be supported by VOCA funds.

- (3) **Non-Allowable Costs and Activities** – The following services, activities, and costs, although not exhaustive, may not be supported with VOCA victim assistance grant funds:
- (a) **Lobbying and Administrative Advocacy** – VOCA funds may not support victim legislation or administrative reform, whether conducted directly or indirectly.
  - (b) **Perpetrator Rehabilitation and Counseling** – Subrecipients may not knowingly use VOCA funds to offer rehabilitative services to offenders. Likewise, VOCA funds may not support services to incarcerated individuals, even when the service pertains to the victimization of that individual.
  - (c) **Needs Assessments, Surveys, Evaluations, and Studies** – VOCA program funds may not be used to pay for efforts conducted by individuals, organizations, task forces, or special commissions to study and/or research particular crime victim issues.
  - (d) **Prosecution Activities** – VOCA funds may not be used to pay for activities that are directed at prosecuting an offender and/or improving the criminal justice system's effectiveness and efficiency, such as witness notification and management activities and expert testimony at a trial. In addition, victim witness protection costs and subsequent lodging and meal expenses are considered part of the criminal justice agency's responsibility and may not be supported with VOCA funds.
  - (e) **Fundraising Activities** – VOCA funds may not be used for fundraising activities.
  - (f) **Indirect Organizational Costs** – The costs of liability insurance on buildings; capital improvements; security guards and body guards; property losses and expenses; real estate purchases; mortgage payments; and construction may not be supported with VOCA funds.
  - (g) **Property Loss** – Reimbursing crime victims for expenses incurred as a result of a crime such as insurance deductibles, replacement of stolen property, funeral expenses, lost wages, and medical bills is not allowed.
  - (h) **Most Medical Costs** – VOCA funds may not pay for nursing home care (emergency short-term nursing home shelter is allowable), home health-care costs, in-patient treatment costs, hospital care, and other types of emergency and non-emergency medical and/or dental treatment. VOCA victim assistance grant funds may not support medical costs resulting from victimization, except for forensic medical examinations for sexual assault victims.
  - (i) **Relocation Expenses** – VOCA funds may not support relocation expenses for crime victims such as moving expenses, security deposits on housing, ongoing rent, and mortgage payments. However, VOCA funds may be used to support staff time in locating resources to assist victims with these expenses.
  - (j) **Administrative Staff Expenses** – VOCA funds may not be used for salaries, fees, and reimbursable expenses associated with administrators, board members, executive directors, consultants, coordinators, and other individuals unless these expenses are incurred while providing direct services to crime victims.
  - (k) **Development of Protocols, Interagency Agreements, and Other Working Agreements** – These activities benefit crime victims, but they are considered examples of the types of activities that subrecipients undertake as part of their role as a victim services organization, which in turn qualifies them as an eligible VOCA subrecipient.
  - (l) **Costs of Sending Individual Crime Victims to Conferences** – VOCA funds may not be used to send crime victims to conferences.

- (m) **Activities Exclusively Related to Crime Prevention** – VOCA funds may not be used for activities exclusively related to crime prevention.
- (n) **Development of Training Materials** – VOCA funds may not be used to develop training materials.
- (o) **Preparing grant applications and other funding requests** – VOCA funds may not be used for preparing grant applications and other funding requests.

### Calculating Program Match:

VOCA has a match requirement of 20%. This may be cash, in-kind, or a combination of the two. Match funds may not be federal, state, or otherwise obligated funds.

#### Computing the Match Funds:

$$\frac{\text{Federal Dollars Requested}}{\text{Federal Percent}} = \text{Total Project Cost}$$

Next: Total Project Cost – Federal Dollars Requested = Required Match Amount

#### Example:

$$\frac{\$12,000}{80\%} = \$15,000 \text{ (Total Project Cost)}$$

Next: \$15,000 - \$12,000 = \$3,000 (Required Match Amount)

## **Volunteers:**

***Volunteers are an integral component of a victim assistance program and a requirement of all agencies receiving VOCA funds.***

ICJI encourages all victim assistance programs, regardless of funding, to utilize volunteers. The recruitment, training, and management of volunteers can be time consuming, but it is a rewarding process. One of the key ways to recruit, maintain, train, and use volunteers effectively is to assign them duties in ways that they can interact with victims in a meaningful way or by using their personal strengths for the benefit of the agency, i.e. computer skills, etc.

The following is a list of ways to utilize volunteers and to keep them involved, motivated and fulfilled. Remember, use your imagination and be creative in recruiting, training, and retaining volunteers.

- **Volunteer Opportunities:**

- o Crisis intervention
- o Public presentations about the services your agency provides
- o Phone calls to victims
- o Supportive counseling
- o Criminal justice advocacy or courtroom accompaniment
- o Preparation of brochures and other sources of information for victims
- o Aerobic instructions to teach exercise
- o Teachers during the summer for literacy training and children's programs in shelters
- o Retired people looking for meaningful use of time
- o Students from local colleges and universities
- o Temporary service agency personnel to teach resume writing
- o Maintenance workers to donate their skills for shelter grounds, buildings and office space
- o Craft store employees to teach crafts
- o Printers and copy centers to provide printed materials at cost

- **Tips to Keep Volunteers Motivated:**

- o Annual banquets/dinners
- o Regular meetings
- o Thank you notes
- o T-shirts to identify volunteers with the program
- o Awards
- o Training on a wide range of subjects
- o Publicity regarding volunteer activities in the local paper
- o Joint meetings with other agencies who utilize volunteers for crime victim services
- o Frequent feedback

# Violence Against Women Act (VAWA) – STOP Funds

## Background:

Since 1995, Violence against Women Act (VAWA) – STOP funds have been appropriated annually by Congress specifically to enhance services to women who are victims of domestic violence, stalking, and sexual assault. The Office on Violence against Women (OVW) is a component of the U.S. Department of Justice. Created in 1995, OVW implements the Violence against Women Act and subsequent legislation and provides national leadership against domestic violence, sexual assault, and stalking. Since its inception, OVW has launched a multifaceted approach to responding to these crimes by forging state, local and tribal partnerships among police, prosecutors, the judiciary, victim advocates, health care providers, faith leaders, and others. OVW grants help provide victims with the protection and services they need to pursue safe and healthy living while also enabling communities to hold offenders accountable.

Services\*Training\*Officers\*Prosecutors (STOP) Violence Against Women Formula Grant Program, by statute, supports communities in their efforts to develop and strengthen effective law enforcement and prosecution strategies to combat violent crimes against women and to develop and strengthen victim services in cases involving violent crimes against women.

## Eligible Subrecipient Organizations:

Agencies eligible to receive S.T.O.P. grants from the funding allocations are as follows:

- Victim Service Providers\*
- Law Enforcement Agencies
- Prosecutor's Offices
- Courts

*\*Examples would be nonprofit, nongovernmental victim service agencies providing services to victims of domestic violence, sexual assault, and stalking.*

The ICJI 2010-2012 S.T.O.P. Implementation Plan has identified the following populations as being “underserved”:

- Elderly
- Disabled
- Hispanic/Latino
- Rural/Poverty
- Immigrant

To view the entire 2010-2012 STOP Implementation Plan, please go to the VAWA-STOP page of the ICJI website. <http://www.in.gov/cji/2601.htm>

## **Eligible Activities – Statutory Purpose Areas**

STOP grant funds must be used to address specific purpose areas. These purpose areas are listed below in no particular order. When applying for STOP funds, an agency will select which purpose area(s) to request funding to help address the needs of the community.

1. Training law enforcement officers, judges, other court personnel, and prosecutors to more effectively identify and respond to violent crimes against women, including crimes of sexual assault, domestic violence, and dating violence.
2. Specialized units of law enforcement, judges, other court personnel, and prosecutors specifically targeting violent crimes against women, including the crimes of sexual assault, domestic violence, and dating violence.
3. Police, court, and prosecution policies, protocols, orders, and services specifically devoted to preventing, identifying, and responding to violent crimes against women, including the crimes of sexual assault and domestic violence.
4. Data collection and communication systems, including computerized systems, linking police, prosecutors, and courts or for the purpose of identifying and tracking arrests, protection orders, violations of protection orders, prosecutions, and convictions for violent crimes against women, including the crimes of sexual assault and domestic violence.
5. Victim services programs, including sexual assault, domestic violence and dating violence programs; delivery of victim services to underserved populations; specialized domestic violence court advocates in courts where a significant number of protection orders are granted; and increased reporting and reduced attrition rates for cases involving violent crimes against women, including crimes of sexual assault, domestic violence, and dating violence.
6. Programs to address stalking.
7. Addressing the needs and circumstances of American Indian tribes in dealing with violent crimes against women, including the crimes of sexual assault and domestic violence.
8. Supporting formal and informal statewide, multidisciplinary efforts, to the extent not supported by state funds, to coordinate the response of state law enforcement agencies, prosecutors, courts, victim service agencies, and other state agencies and departments to violent crimes against women, including the crimes of sexual assault, domestic violence, and dating violence.
9. Training of sexual assault forensic medical personnel examiners in the collection and preservation of evidence, analysis, prevention, and proving expert testimony and treatment of trauma related to sexual assault.
10. Programs to assist law enforcement, prosecutors, courts, and others to address the needs and circumstances of older and disabled women who are victims of sexual assault or domestic violence, including recognizing, investigating, and prosecuting instances of such violence or assault and targeting outreach and support, counseling, and other victims' services to such older and disabled individuals.
11. Assisting victims of sexual assault and domestic violence in immigration matters.
12. Maintaining core victim services and criminal justice initiatives, while supporting complementary new initiatives and emergency services for victims and their families.

13. Supporting the placement of special victim assistants (to be known as "Jessica Gonzales Victim Assistants") in local law enforcement agencies to serve as liaisons between victims of domestic violence, dating violence, sexual assault, and stalking and personnel in local law enforcement agencies in order to improve the enforcement of protection orders.
14. To provide funding to law enforcement agencies, nonprofit nongovernmental victim service providers, and State, local, territorial, and local governments, (which funding stream shall be known as the Crystal Judson Domestic Violence Protocol Program) to promote
  - The development and implementation of training for local victim domestic violence service providers, and to fund victim services personnel, to be known as "Crystal Judson Victim Advocates," to provide supportive services and advocacy for victims of domestic violence committed by law enforcement personnel; and
  - The development (in collaboration with State, Tribal, territorial and local victim services providers and domestic violence coalitions) and implementation of protocols within law enforcement agencies to ensure consistent and effective responses to the commission of domestic violence by personnel within such agencies.

***Before choosing Purpose Areas 13 or 14 in the grant application, please contact the Victim Services Division Director.***

#### **Ineligible Activities:**

- S.T.O.P. funds may not support legal or defensive services for perpetrators of violence against women, but they may support Batterers Intervention Programs, if the intervention is part of a graduated range of sanctions that use the coercive power of the criminal justice system to hold abusers accountable for their criminal actions and for changing their behavior.
- Children's services supported with VAWA funds must be inextricably linked to providing services to victims of domestic violence. For example, STOP funds may support the expansion of shelter services for battered women to include their children but not support violence prevention curricula in schools.
- Fundraising activities may not be supported with STOP funds.
- Prevention activities may not be supported with STOP funds. However, awareness activities may be supported with STOP funds. Please contact the Victim Services Division for more clarification.



## Allowable Costs:

In general, STOP program grants may support personnel, training, technical assistance, data collection and equipment costs to enhance the apprehension, prosecution, and adjudication of persons committing violent crimes against women and to provide or improve services for victims.

## Program Match:

STOP has a match requirement of 25%. This may be cash, in-kind, or a combination of the two. Match funds may not be Federal or otherwise obligated funds. The costs of activities counted as match must be directly related to the project goals and objectives. For example, if half of an advocate's time is supported with grant funds, the advocate must track all of his/her time to demonstrate 50% was devoted to the grant funded project. In-kind match must be documented in the same manner as grant funded activities.

### Computing the Match Funds:

$$\frac{\text{Federal Dollars Requested}}{\text{Federal Percent}} = \text{Total Project Cost}$$

Next: Total Project Cost – Federal Dollars Requested = Required Match Amount

### Example:

$$\frac{\$12,000}{75\%} = \$16,000 \text{ (Total Project Cost)}$$

Next: \$16,000 - \$12,000 = \$4,000 (Required Match Amount)

Matching funds are no longer required for the Victim Service agencies if the service is a direct service to victims. Law enforcement, prosecution, and courts are required to provide the 25% match, unless a match waiver is requested at the time the grant application is submitted and approval is given by ICJI.

A match waiver is based upon demonstrated financial needs, such as:

- Natural disasters
- Lay-offs
- Double-digit unemployment rates
- Reduction in funding
- Other circumstances indicating financial need

The agency should submit a written request for a match waiver directly to the Victim Services Division Director at ICJI. ICJI has the discretion to approve match requests. Should ICJI choose to deny a match waiver, the denial must be approved by the Federal Program Specialist at the Office on Violence Against Women. All subrecipients will receive written response. If approved, a match waiver is only good for the current grant cycle.

An agency that provides a combination of victim services and other services (law enforcement, prosecution, and courts) will be required to provide a match for the non-victim services portion of the grant.

## VOCA & STOP Grant Match Requirements

The purpose of matching contributions is to increase the amount of resources available to projects supported by federal grants. Matching contributions vary from grant to grant, but **federal funds are not allowed to be used as a match for VOCA and STOP awards**. Also, it is not allowable to match a federal grant with state funds because state funds have already been assigned to cover specific activities.

It is recommended that funds designated as match should be reported from the beginning of the grant to ensure the match requirement is met by the end of the grant. You may not delay reporting match until the end of the contract, unless prior written approval is received from ICJI.

Match records must be maintained and clearly show the source, the amount, and the period during which the match was allocated and expended. The basis for determining the value of personnel services, materials, equipment, and space must be documented. Volunteer services must be documented and supported in the same manner as the program's paid employees. Programs should not report more than the required match amount based on the STOP or VOCA award.

Cash and in-kind match must be tied to the overall cost of the specific grant activity and be approved by ICJI. Match may not cover activities that are ineligible under the grant guidelines.

### Cash Match:

Cash match (sometimes called "hard" match) is actual dollars spent for the project related costs, i.e. dollars spent on the pro-rated portion of rent or for direct service providers' salaries.

### In-Kind Match:

In-kind match (sometimes called "soft" match) is the value of goods or services received or provided that have no associated cost to the program. An example would be donated time by professionals or volunteers or equivalent rental value of donated equipment. It is recommended the hourly rate assigned to the volunteer match be the hourly rate of an entry-level advocate in your program. The rate for a volunteer must be approved by ICJI. Allowable in-kind match may be all hours during which a volunteer provides direct services to victims. Agencies may also count on-call hours as long as they are consistent with your personnel policies for paid staff. For example, if paid staff receives compensation for a minimum of two hours of an eight hour on-call shift, even if staff is not actually called out, then the agency may count the volunteer's hours in the same fashion.

In-kind match may include donations of expendable equipment; office supplies; workshop, education or training materials; work space; or the monetary value of time contributed by professional and technical personnel and other skilled labor, if the services provided are an integral and necessary part of a funded project. The value placed on loaned or donated equipment may not exceed its fair rental value. The value placed on donated services must be consistent with the rate of compensation paid for similar work in the organization or the labor market. Fringe benefits may be included in the valuation.

Volunteer services must be documented and, to the extent feasible, supported by the same valuation methods used by the recipient organization and its employees. The value of donated space may not exceed the fair rental value of comparable space, as established by an independent appraisal of comparable space and facilities in a privately owned building in the same locality. The value for donated tangible goods shall be reasonable and not exceed fair market value at the time of the donation. The basis for determining the value of personal services, materials, equipment, and space must be documented.

Following are some specific examples of possible match for your program:

### **Cash Match**

- The salaries of any subrecipient employees who are working on grant related purposes, but not paid with grant funds might be used. For example, a hotline coordinator at a shelter, a police officer or prosecutor working on a sexual assault unit or other employees could be used as match to the extent that they are not paid by federal or state funds.

### **In-Kind Match**

- If an entity, other than the subrecipient, donates office space free of charge to the subrecipient for the project, the rental value of the space may be used as match. For example, a police department may donate an office to house a victim advocate from a domestic violence shelter. Similarly, the cost of utilities, insurance, security, janitorial services and the like may be used as in-kind match to the extent they are not being paid out of grant funds. Programs also may receive short-term donations of space, such as a room to hold a meeting or a training event, which may be used as match.
- The reasonable value of other donated tangible goods may be used as match. For example, a program may receive donations of used clothing, the reasonable value of which may be used. A funded shelter may also solicit donations from individuals and from companies, such as grocery stores, of food and items such as shampoo and toothpaste for use by victims, toys and other supplies such as diapers or formula for victims' children, and supplies for the program itself such as furniture and computers.
- Subrecipients may also receive donations of services that can be used as match. For example, a local printing company may agree to print some training materials at no cost to the program. Other examples of donated services may include web space and services, other computer services, legal services, translation services, telephone services and accounting services for the program as well as psychological counseling, job training, medical supplies, taxi and hotel vouchers, and child care services for victims. The services could be provided by an individual volunteer or by a company.

# Reporting

## Financial Reports

Financial Reports are due within 20 days of the end of the quarter.

Quarter Ends	Report Due
September 30	October 20
December 31	January 20
March 31	April 20
June 30	July 20

Final Financial Reports (if needed) are due 30 days after the grant closes. If the quarterly report submitted on July 20 does not reflect all expenditures from the grant period, then a Final Financial Report needs to be submitted. An example of when a Final Financial Report needs to be submitted would be if an item is ordered during the grant period but not paid for until delivery which falls after the end date of the grant. Please contact the Victim Services Division if you have specific questions.

## Performance Reports

*Quarterly Reports:* VOCA and STOP Quarterly Performance Reports are to be submitted via email to the Grant Program Manager no later than 20 days after the end of each quarter. These reports are due at the same time as the Financial Reports.

*STOP Annual Report:* The annual Muskie Performance Report is to be submitted via email to the Grant Program Manager by January 20 of each year via email.

**Failure to meet reporting deadlines may lead to the suspension or deobligation of grant funds.**

## VOCA Reports

VOCA Financial and Performance Reports can be found on the ICJI website at <http://www.in.gov/cji/2605.htm>

## STOP Reports

STOP Financial and Performance Reports can be found on the ICJI website at <http://www.in.gov/cji/2601.htm>

## Additional Subrecipient Requirements

As a subrecipient of grant funds from ICJI, the implementing agency must also abide by and/or submit the following information to ICJI:

- The project director for the implementing agency must have an email address that is checked on a regular basis (at least once a week).
- Grant applications must include a physical address for the purpose of conducting site visits.
- All agencies receiving VOCA and/or STOP funds must submit an audit report every year.
- Subrecipients must obtain a DUNS number prior to the release of grant funds.

## Budgeted Funds and Program Change Request

It is important to check the rate of expenditures periodically during the grant period to ensure the expenditures are on track so funds can be requested to be reallocated if necessary.

### Program Change Requests

A Program Change Request should be submitted no later than 30 days prior to the end of the grant/contract. However, approval will not be granted retroactively for expenditures incurred before the request.

A budget modification is a change in the budget such as the reallocation of funds, the revision of funds, or the receipt of additional funds. Program Change Requests may be approved to move funds from one authorized category to another, but a new spending category may not be added that may change the original purpose of the grant. This means once an application has been approved for funding, you will be limited to the requested budget categories from the original grant application. Any change in budget, total award, program or project ending date, or changes in grant funded staff must be requested in writing.

Subrecipients must always contact their Grant Program Manager or the Victim Services Division Director before submitting a Program Change Request, and **never implement proposed changes until written approval is provided by ICJI.**

Some change requests can be reviewed administratively, while others require review by the ICJI Board of Trustees. As the Board of Trustees only meet quarterly, requests requiring their approval may take longer for processing. The following is a guide for review procedures:

#### Administrative Review

- Changes in budget involving the transfer of funds from one category to another
- Increase in funding less than 10% of the total project cost
- Increase in funding is less than \$6,000
- Changes in project end date

#### Board of Trustees Review

- Any significant project change
- Increase in funding is more than 10% of the total project cost
- Increase in funding is more than \$6,000

The following are examples of when a program may want to request a reallocation of funds:

- If you were awarded grant funds to purchase a computer but found what you really need is to send a staff member to training, you may want to reallocate funds from Operating Expenses to Travel/Training.
- You discover you have unused funds in one category and not enough in other. If this happens, you may want to reallocate funds.

## Financial Management Do's and Don'ts

This section will be of greatest benefit to directors of small non-profit organizations who are struggling to provide important services to the public and are generally looking to break even between income and expenses. Most government agencies and large non-profit agencies have dedicated and independent financial personnel. Some of the following are recommended practices, some of which are Federal guidelines and some are acceptable account practices. You should follow all!

### Do...

- Contract with an accountant before you contract with an auditor. Both are accountants, but it is important to have set up your financial system before having the other inspect your proficiency in classifying resources and expenditures towards development of balance sheets and income statements.
- Assure some separation of fiscal responsibilities. While you may have the staff to accomplish this, another party should reconcile accounts and verify disbursements.
- Immediately record all transactions. The end of the business day is adequate but waiting a week is inviting trouble.
- Track the sources and expenditure of match funds or in-kind contributions. These must go towards the specific grant allowable activities.
- Submit timely reports. This reflects on the reliability of the subrecipient. Untimely reports distort the accuracy of the overall grant financial position reported each quarter and could indicate poor monitoring of the funds.
- Track grant funded equipment in your standard inventory procedures which include identifying present location and condition, acquisition cost, manufacturer's model and serial number, and ultimate disposition.

*If the equipment purchase price is \$5000 or more for each item, it must have a State of Indiana asset tag. Please contact your Grant Program Manager for more information.*

- Establish written procurement procedures. Minimum standards exist for federal and state funds. Please see [Indiana Department of Administration - Procurement Information](#) page for more information about the state guidelines.
- Double check your match and verify your expenditures when completing quarterly reports. ICJI site visits may emphasize verifying a randomly chosen single month's activities. Double checking data will help assure an accurate administrative history.
- Utilize pre-numbered and sequential financial documents in order.
- Keep accurate time and activity reports for all grant funded, or partially funded, positions.
- **BUDGET!** Each month provide your board treasurer and chairperson with the month's fiscal report. This should show actual revenue and expenditure activity for the month and year to date. Explain any variance. Include next month's projected activities and if the board does not ask for a financial report... provide it to them anyway.
- Report modifications to your program manager. Use the approved ICJI Program Change Request for all budget changes.

- Keep all receipts, receiving reports, invoices, checks, etc. Lack of documentation is one of the biggest audit findings.

### **Don't...**

- Hire a relative, even for a menial job, or hire your own consulting firm without a resolution from your board of directors.
- **Commingle funds!** This is frequently misunderstood but is one of the most common audit findings. A simple way to assure you are not commingling funds is to identify the revenue source for each expenditure. The average bookkeeping program can trace this for you, even for multiple revenue sources. If you are not familiar with these, your accountant can set one up for you.
- Overlook audit findings.
- Claim expenditures for obligations outside of the funding period.
- Temporarily cover one grant's expenditures with other grant funds.

## Tracking of Expenditures

1. If your grant project includes emergency expenses for victims, then you must keep records of who received the funds and how and when the funds were used. (Keep receipts!)
2. If your grant project includes equipment or furniture, follow your agency's procurement policy. If your agency does not currently have a policy, develop and adopt a policy. Then you must keep invoices with the description of the item, serial number, cost, etc. Label each item with a tag stating, "Purchased with (VOCA or STOP) grant dollars."
3. If your grant project includes mileage, then you must keep a mileage log that includes dates, destinations, miles, and purchases.
4. If your grant project includes operating expenses such as rent, utilities and/or telephone, then you must charge only a pro-rated portion of these expenses. Example: if the grant is 10% of your overall budget, only charge 10% of these expenses.
5. If your grant includes the development of materials for publication such as the printing of brochures, the following wording should be printed on the materials:

**VOCA:** This project is supported in part (or in whole) by grant #\_\_\_\_\_, from the U.S. Department of Justice, Office of Justice Programs, Office for Victims of Crime through the Indiana Criminal Justice Institute. Views contained herein are those of the author and do not represent the position of USDOJ or ICJI.

**STOP:** This project is supported in part (or in whole) by grant #\_\_\_\_\_, from the U.S. Department of Justice, Office of Justice Programs, Office on Violence Against Women through the Indiana Criminal Justice Institute. Views contained herein are those of the author and do not represent the position of USDOJ or ICJI.

6. If your grant project includes salary and related expenses, you must keep signed time sheets for the funded employee identifying the types of activities performed (i.e. direct services, administrative, training, travel, etc). Ensure that the employee is performing allowable activities. Keep a personnel file, signed policy statements, and job descriptions, etc.
7. If your grant project includes training expenses, you must keep track of the training attended, dates and personnel who attended.
8. If your grant project includes travel expenses, you must follow your agency policy regarding allowable expenses. Keep an itemized list of travel expenses, including amount for airfare, hotel, ground transportation, and per diem. If your agency does not have a written travel policy, then you must follow the State's travel policy. ([http://www.in.gov/idoa/files/travel\\_policy.pdf](http://www.in.gov/idoa/files/travel_policy.pdf))
9. If a grant-funded position is vacant, you must notify your Grant Program Manager immediately and keep them informed of the hiring progress.
10. If the project director leaves the agency, you must notify your Grant Program Manager immediately and keep them informed of the hiring progress.
11. If the subrecipient experiences vacancy savings due to staff turnover or delay in hiring personnel, you must notify your Grant Program Manager immediately of the dollar amount and request a reallocation or reversion of funds.



12. If the project is not operational within 60 days of the original start date, the agency must communicate with the grant manager identifying the reasons for the delay, plan of action, and expected start date.
13. If the project is not operational within 90 days of the original start date, the agency must submit a report identifying the reasons for the delay. In this case, ICJI reserves the right to cancel the contract.
14. Any budget modifications must be submitted in writing on the approved Program Change Request Form to the Victim Services Division for review before reallocating any funds.
15. Any financial impropriety discovered must be reported to the Victim Services Division immediately.

## Reversion of Grant Funds

All VOCA and/or STOP funds must be spent or obligated by the last day of the grant period. If you determine you will be unable to expend all funds by this date, it is imperative that you notify your Grant Program Manager immediately. ***You may not carry over funds from one grant period to the next!***

## In and Out of State Travel Guidelines for Contract Staff

Agencies that enter into contracts which provide for specific reimbursement of travel expenses must specify in the contract that travel reimbursement to persons under contract will be consistent with Financial Management Circular No. 2003-1.

Also, if your grant project includes travel expenses, you must follow your agency policy regarding allowable expenses. Keep an itemized list of travel expenses, including amount for airfare, hotel, ground transportation, and per diem.

If your agency does not have a written travel policy, then you must follow the state's travel policy. ([http://www.in.gov/idoa/files/travel\\_policy.pdf](http://www.in.gov/idoa/files/travel_policy.pdf))

# Tips for Successful Grant Writing

## Before You Begin

- Read carefully through the guidelines and application packet. Understanding the eligibility requirements will save you from writing an ineligible application or from having items removed because they are ineligible. Becoming familiar with the material will help you find needed information as you prepare your application.
- GET ORGANIZED! Gather and organize all the information you need. This will facilitate your thinking and writing process.
- Prepare a schedule. Allow plenty of time to complete the application including time to proofread, edit, revise, obtain necessary signatures and make all copies. Allow for errors and do not leave final preparations until the last minute. You want to be sure to submit your application on time.

## Preparing Your Application

- Read and follow all instructions. Your application will be processed more quickly if requested information is complete and correct.
- Be sure to use the most current grant application! This can be found on the ICJI website.
- Do not copy and paste from previous grant applications!
- Complete each section of the application and be sure to answer all questions.
- If you think a question does not apply to your program, call a Grant Program Manager and ask what you should do, or respond to the question with an explanation of why the question does not apply. **Do not leave any questions blank or omit questions because it will appear you may have forgotten to respond!**
- If any portion of your application is incomplete, and you receive a grant award, there will be special conditions in your grant award letter that will be required to be addressed prior to the release of any grant funds.
- Ask a person who is not familiar with your program to read your application responses before you submit the application packet.

## Project Narratives and Abstracts

- Grants are reviewed based on the requested information in the application kit. If you follow the required format, it will be easier for the reviewers to locate the information.
- Answer the narrative questions clearly and concisely.
- Include sufficient details and explanations as necessary to fully answer the questions. If you include excess information not requested in the application, your meaning may be lost.
- Keep the language simple and direct.
- Explain all abbreviations or terms a person outside of your agency may not understand.
- Use headings, bullet formats, or tables if appropriate.
- Use page numbers and/or a table of contents as it helps with clear organizations of your application.

## Project Budgets

Review the budget rules regularly while preparing your request. A line for an ineligible expense may cause the total amount of the grant award to be less than requested.

- Be reasonable in your budget request. Funds are limited and the Victim Services Division would like to provide funding to as many programs as possible.
- Double-check your math. Calculation errors may also cause an award amount to be less than expected.

## **Tips for Writing Goals and Objectives**

The difference between goals and objectives:

- Goals are broad; objectives are narrow.
- Goals are general intentions; objectives are specific.
- Goals are intangible; objectives are tangible.
- Goals are abstract; objectives are concrete.
- Goals can't be validated as is; objectives can be validated.

**Goals:** A goal is a broad, general statement that identifies the long-range purpose of the program. It is the desired result or outcome.

### **Examples of Goals**

These are examples of weak goals because they are vague and do not identify the long-range goal to be attained.

#### **WEAK GOAL STATEMENTS:**

- To continue the work of the advocate.
- To reach out to victims of crime in the county.
- To improve collaboration.
- Reduce domestic violence and sexual assault.

These are examples of strong goals because they are specific and identify the goal to be achieved.

#### **STRONG GOAL STATEMENTS:**

- The goal of this project is to enhance interagency coordination by forming a county-wide Violence Against Women Task Force, comprised of the victim service agency, county sheriff, local police departments and the prosecutor's office.
- The goal of the project is to increase the number of sexual assault cases prosecuted by the prosecutor.
- The goal of this project is to provide training to the judiciary on issues of child abuse in connection with the use of methamphetamine in the home.

**Objectives:** Objectives are specific, attainable, measurable and time bound. Performance measures identify the measurable component of the objective. Program objectives that are measurable become the criteria by which the effectiveness of the program is judged. Useful program objectives will describe: **WHAT** is going to be done; **HOW** will it be done; **WHEN** will it be done; and **HOW** will the results be measured.

### **Examples of Objectives**

These are examples of weak objectives because they are vague and may not be measured.

#### **WEAK OBJECTIVES:**

- To continue the work of the advocate.
- To decrease the number of domestic violence calls to law enforcement in the county.
- To expand public awareness activities.

These are examples of strong objectives because they are specific and measurable.

#### **STRONG OBJECTIVES:**

- To conduct six domestic violence trainings for three police departments in the county by June 30.
- To increase CASA volunteer numbers by 10% over last year. This will be accomplished by holding 2 extra training sessions.
- To increase counseling services to children by 25%. This will be accomplished by hiring an additional part-time children's counselor.

## **Before You Submit Your Application**

After your application is complete, consider the application as a whole. **Then ask yourself:**

- Did I answer **all** of the questions and include all required documents?
- Did I demonstrate the community need for my program?
- Did I demonstrate how my program will meet the need?
- Did I demonstrate how my program is the best investment of limited resources?
- Did I demonstrate how my program is part of a collaborative community effort to serve victims?
- Did I demonstrate my agency/organization has the capacity to fulfill both: the program objectives and management of the grant?

## **Funding Barriers**

Each year, a grant application stands on its own merit.

***There are no guarantees that a project will continue to be funded or that a new project will be funded at the level being sought in the grant proposal.***

Some deficiencies seen during grant review, which may effect full funding of the proposed project, may include the following:

- Using a prior year's application
- Missing required attachments
- Submitting incomplete or inaccurate budgets
- Submitting late applications
- Application requesting funding for ineligible activities under the grant

Barriers to fully funding a continuation application may be the result of:

- Reports being 30 or more days late. These reports include Financial and Performance Reports, Subgrant Award Reports, Award Letters, and any other requested information.
- Significantly inaccurate Financial Reports.
- Unresolved negative findings from site visits.
- Unallowable budget modifications.
- Comingling of funds.
- Required match funds not used for allowable purposes.

## Preparing for Site Visits

The objective of site visits conducted by the Victim Services Division is to review each program's management functions; inventory the services provided by each program; examine the process for delivering services; evaluate the knowledge, skills, and abilities of program staff; and to perform an evaluation of the fiscal system.

When the Division calls to schedule a site visit, seize the opportunity to "showcase" your program. Take a moment to think about all of your accomplishments and successes over the past year including, but not limited to, the following:

- Development of new brochures, posters, videos, etc.
- Involvement in collaborative efforts within your community.
- New services/assistance offered by your agency.
- Involvement with task forces, communities, coalitions, etc.

Additionally, you should...

- Ensure all requested materials are available to avoid having to search for materials at the time of the site visit.
- Review your notes and correspondence from ICJI regarding previous site visits.
- Review the site visit form prior to the visit to ensure questions can be answered.
- Ensure financial records adequately reflect grant revenues, expenditures, and match. If at all possible, the fiscal manager should be available at the time of the site visit in case a question arises.
- Make sure statistical records are accurate and up to date.
- Ensure that your program has specific and measurable long and short term goals and objectives for your program as a whole. Please have a copy available.

The site visit is also a good opportunity for you to discuss challenges faced by your program. Advising ICJI staff on these issues could impact funding in service gaps.

## Most Common Site Visit Findings

- Untimely report submissions
- Lack of internal controls
- Lack of documentation
- Comingling of funds
- Inadequate time and attendance records
- Inaccurate financial records
- Unallowable costs
- Conflict of interest
- Unapproved changes in budget
- Lack of written policies and procedures

***When ICJI Staff contacts you to schedule a site visit, you will be emailed the Site Visit Form to help you prepare for the visit.***

In the event that an on site visit may not take place, the Division will contact you about completing a Desk Review. You should prepare for a desk review in the same way as an on site visit. Be prepared to send requested information to the staff performing the desk review.

## Checklist for Grant Management

- ✓ Grant application and required copies are submitted by the due date.
- ✓ Grant Award Letter and Subgrant Award Report are submitted by the date indicated on the Award Letter.
- ✓ Financial and Performance Reports for the quarter ending September 30 are submitted by October 20.
- ✓ Financial and Performance Reports for the quarter ending December 31 are submitted by January 20.
- ✓ STOP Muskie Annual Report is submitted by January 20.
- ✓ Financial and Performance Reports for the quarter ending March 31 are submitted by April 20.
- ✓ Financial and Performance Reports for the quarter ending June 30 are submitted by July 20.
- ✓ Final Claim Vouchers and final Financial Reports are submitted by July 30.

***Please note that all Performance Reports, and the STOP Annual Muskie Report, are to be submitted via email to your Grant Program Manager. Do not mail hard copies of these reports.***

***Financial Reports are to be submitted via mail as they must include original signatures.***

## Supplanting

Federal funds must be used to supplement existing funds for program activities and must not replace those funds that have been appropriated for the same purpose. Supplanting will be the subject of application review, as well as pre-award review, post award monitoring, and audit. If there is a potential presence of supplanting, the applicant or subrecipient will be required to supply documentation demonstrating that the reduction in non-federal resources occurred for reasons other than the receipt or expected receipt of federal VOCA or STOP funds. For certain programs, a written certification may be requested by OVC, OVW, or ICJI stating that federal funds will not be used to supplant state or local funds.

If you need further guidance, please contact the Victim Services Division.

## Grant Fraud Awareness

Grantees and government employees play an important role in fighting fraud, waste and abuse related to taxpayer funded programs. Offices of Inspectors General exist to help prevent and investigate fraud, waste, abuse and misconduct related to government operations. It is in everyone's best interest to ensure government operates at optimum efficiency and effectiveness and that grant funds are used properly.

### Fraud Assumptions

Fraud can and does happen. The best strategy to mitigate the risks is to increase awareness of the common fraud schemes and encourage appropriate risk management efforts to prevent issues or detect them as early as possible.

### Fraud Consequences

The consequences of fraud can include debarment from receiving future funding, administrative recoveries of funds, civil law suits and criminal prosecution – or a combination of all or some of these remedies.

### What is Grant Fraud?

Grant funds are awarded for a specific “public purpose,” and subrecipients must use those funds as agreed and within certain parameters including the Office of Management and Budget Circulars and granting agency guidelines. Most issues of fraud, including grant fraud, essentially relate to “lying, cheating, and stealing.”

### Overview of the Grant Process

The grant process is an “Integrity Based System” – ICJI relies on everyone to act with honesty in using public funds and in reporting on their use of such funds. Any concern about a lack of integrity anywhere in the process requires careful analysis and follow-up.

### The “Fog of Fraud” – What is Really Happening?

Indicators of fraud, waste, and misuse of grant or other public funds can be due to a variety of causes and are rarely a simple “black and white” issue – ICJI must follow-up on all such concerns to determine what is really happening.

### The Keys to Success

The keys to preventing, detecting and stopping fraud are professional skepticism and communication. ICJI must and subrecipients must follow-up on issues that cause concern and share such information with the appropriate officials.

## Common Grant Fraud Risks

### Conflicts of Interest

Grantees are required to use funds in the best interest of their program. Decisions about the use of funds must be free of undisclosed personal or organizational conflicts of interest – both in appearance and fact. Typical issues include:

- Less than Arms-Length Transactions: purchasing goods or services or hiring an individual from a related party such as a family member or a business associated with an employee of a grantee.
- Subgrant award decisions and vendor selections must be accomplished using a fair and transparent process free of undue influence. Most procurement requires full and open competition.
- Consultants can play an important role in programs; however, their use requires a fair selection process, reasonable pay rates, and specific verifiable work product.



## **“Lying” or Failing to Properly Support**

A grant agreement is essentially a legally binding contract and subrecipients are obligated to use their grant funds as outlined in the agreement and to act with integrity when applying for and reporting their actual use of funds. Subrecipients are also obligated to properly track the use of funds and maintain adequate supporting documentation.

Typical issues include:

- Unilaterally redirect the use of funds in a manner different than outlined in the grant agreement.
- Failing to adequately account for, track or support transactions such as personnel costs, contract, subcontracts, indirect cost rates, matching funds, program income, or other sources of revenue.
- Subrecipients must accurately represent their eligibility for funding and may not provide false or misleading information in their application or subsequent narrative progress or financial status reports.

## **Theft**

Theft is a potential issue in all organizations – including those that receive federal grant funding. Some considerations:

- People that embezzle funds can be extremely creative and appear very trustworthy – precisely why they can do so much damage to an organization and remain undetected for extended periods of time.
- Poor or no internal controls may equal virtually inevitable theft. A lack of appropriate separation of duties is one of the most common weaknesses.
- Checks routinely written to employees as “reimbursement” of expenses and the use of ATM/Debit/Gift/Credit Cards must be carefully controlled and require robust oversight.

## **Risk Mitigation**

There are ways to reduce fraud risk. Some include:

- Examine your specific operations and programs to identify fraud vulnerabilities.
- Implement specific fraud prevention strategies including educating others about the risks – the more people are aware of the issues, the more they can help prevent problems or detect them as early as possible.
- Maintain a well designed and tested system of internal controls. Consider the benefits of a fiscal agent.
- Ensure the financial or other certifications and progress reports are adequately supported with appropriate documentation and evidence.
- Identify any potential conflicts of interest issues and disclose them to the appropriate officials for specific guidance and advice. Ensure everyone involved in the grant process understands the conflict of interest prohibitions.
- Ensure there is a fair, transparent, and fully-documented procurement process especially when utilizing consultants. Ensure the rate of pay is reasonable and justifiable and that the work product is well-defined and documented.

## **Communicate Your Concerns**

Share your concerns related to fraud, waste, and abuse of governmental funds to the Victim Services Division Director.

## Violent Crime Compensation Program

One of the Federal Guideline requirements is that subrecipients assist victims by notifying them that the Violent Crime Compensation Program is available to them.

The Violent Crime Compensation Program is committed to aiding victims of violent crimes and their families by easing the financial burden crime imposes upon them. The fund can assist with expenses such as: medical and funeral expenses, lost wages, loss of support, and psychological counseling.

Consider the following when determining if a victim may be eligible for assistance from the Violent Crime Compensation Program.

**If the victim of a violent crime is able to answer YES to any of the questions below, they may be eligible for violent crime compensation assistance:**

- Are you an Indiana resident who is a victim of a violent crime committed in Indiana?
- Are you a nonresident of Indiana who is a victim of a violent crime committed in Indiana?
- Were you injured while (1) trying to prevent a violent crime or (2) while trying to apprehend someone who committed a violent crime?
- Were you injured while giving aid and assistance to a law enforcement officer in the performance of that officer's duties?
- Were you injured as a result of a motor vehicle crash caused by an individual who was charged with DWI or DUI?

**If you are a parent, surviving spouse, legal dependent or legal representative and you answer YES to any of the following questions below, YOU may be eligible for violent crime compensation assistance:**

- Was the victim a resident of Indiana who was a victim of a violent crime committed in Indiana?
- Was the victim a nonresident who was a victim of a violent crime committed in Indiana?
- Are you a surviving spouse, dependent child or legal guardian of a victim of a violent crime?
- Are you a surviving spouse, dependent child or legal guardian of a victim of a violent crime who died as a result of that crime?
- Are you legally dependent for principle support upon a victim of a violent crime?
- Are you legally dependent for principle support upon a victim who died as a result of a violent crime?
- Was the victim injured while giving aid and assistance to a law enforcement officer in the performance of that officer's lawful duties?
- Was the victim killed as a result of a motor vehicle crash caused by an individual who was charged with DWI or DUI?

**You are not eligible for violent crime compensation if you are:**

- A victim who did not receive physical bodily injury as a result of the crime.
- A victim who has engaged in illegal activity or conduct that caused or contributed to the crime.
- A victim who is injured while confined in a correctional facility.
- A victim who did not report the crime to a law enforcement office within 72 hours after the occurrence of the crime.
- A victim who is killed in a hit and run accident or by a driver who was not convicted of DWI or DUI.

*\*Other exceptions may apply*

### Eligibility Requirements

- There must be a minimum of \$100 in out-of-pocket expenses.
- The application for benefits must be filed no later than 180 days after the crime occurred.

**A maximum award of \$15,000 may be paid for any one injury or death including:**

- Physical therapy
- Prescription drugs
- Dental
- Optometric
- Chiropractic
- Ambulance services
- Prosthetic devices
- Counseling (up to \$3000)
- Funeral expenses (up to \$5000)
- Lost wages
- Loss of support to a legal dependent of a crime victim

**The Violent Crime Compensation Fund does not reimburse for the following:**

- Personal property loss
- Property damage
- Damages for "pain and suffering"
- Crime scene clean-up
- Relocation expenses
- Travel expenses
- Clothing
- Reimbursement for police reports

An application must be submitted within 180 days from the date of the crime. The Violent Crime Compensation Division will review all applications and investigate to verify the information given. If an application is not properly completed, or if additional information is required, the Division will send a written explanation to the applicant of what is needed. If the requested information is not provided within 30 days of the request, the application may be denied. The victim will be notified by mail of the results of the Division's investigation and their determination.

**Additional Information**

The Division may make an award in full, in part, or deny a claim altogether. In the event that expenses exceed the maximum award of \$15,000, the Division will divide the award to pay as many providers as possible.

The Violent Crime Compensation Fund is a **payer of last resort**. This means that all other sources must be exhausted before an award can be made. Therefore, pursuant to Indiana Statute, the final award shall be reduced by the amount of benefits covered by insurance (i.e. medical, automobile, homeowners, disability), unemployment compensation, worker compensation, Social Security, public funds (including Medicare, Medicaid, and Township Trustees), or any other source.

*Note: If a victim and/or claimant receives Violent Crime Compensation Funds, and later receives an insurance settlement, court-ordered restitution, or a civil settlement covering the same loss paid by the Division, **THE VICTIM AND/OR CLAIMANT MUST REPAY THE STATE OF INDIANA.***

You can access more information on this program by calling (317) 232-0157 or (800) 353-1484, by sending an email to [victimservices@cji.in.gov](mailto:victimservices@cji.in.gov), or by reading [Indiana Code 5-2-6.1](#).